



## Protecting your privacy

VIVID Housing Limited is registered in England and Wales as a registered society under the Co-operative and Community Benefit Societies Act 2014 under number 7544 with exempt charity status and as a registered provider of social housing with the Homes and Communities Agency under number 4850. Our registered office is at Peninsular House, Wharf Road, Portsmouth, Hampshire, PO2 8HB.

We are registered as a data controller with the Information Commissioner's Office with registration number ZA248321.

We're committed to protecting your privacy by storing your data securely and handling it appropriately.

This notice is designed to tell you what data we collect, why we collect it, what we use it for and if we share it with anyone else.

### Controlling your personal information:

- We will keep you informed on how your data is used
- You can ask to see the personal information we hold about you.
- You can have personal information corrected if it is not accurate or complete.
- You can ask us to delete personal data where there's no reason for us to keep using it.
- You can limit the way that we use your data
- You can change your mind and withdraw consent for us to use your data.
- You can ask us to send you your personal data should you want to reuse it for anything else.
- You also have rights in relation to automated decision-making (including profiling). This is when decisions are made automatically without any human involvement. You can ask someone to review the decision or to know how it's been made.
- You can object to us processing your personal data for direct marketing.

We'll support these rights unless there's a good reason for us to keep hold of your data and continue to use, these reasons can be found within this notice.

From time to time we'll check with you that the data we hold on file is accurate and up to date. This is so we can make sure we have the most up to date information about our customers and amend it if appropriate.



## **Applying to rent or buy a property from us:**

### **When you apply to rent a home or garage from us, we'll ask for:**

- your full name and proof of identity
- your date of birth
- your email address and phone number
- your national insurance number
- your address
- your salary and employment details
- outgoing money details e.g. bills
- details of previous debts and loans
- the name of anyone authorised to act on your behalf
- names and dates of birth for others within your home
- your bank details
- information about your previous tenancies; such as anti-social behaviour issues and rent arrears
- any language needs e.g. if English isn't your first language
- tax and benefit details
- any disability needs
- information on your savings

### **We collect and process this information so that we can:**

- assess your eligibility to rent or buy a home or garage from us and decide whether to offer you a tenancy
- contact you to arrange viewings
- contact you to discuss the details you've provided
- communicate with you in an appropriate way and deliver you the best service
- set up your account for all future communications and collect payments for rent and service charges
- contact you about your application, during the sales process and once you become a leaseholder
- assess your eligibility and affordability for a mortgage and your credit worthiness. This is to make sure we allocate properties in line with our regulator's guidance and our policy
- confirm your identity, residence details and source of deposit so our solicitors can complete legal paperwork and the requirements to purchase a property
- determine the progress and timeframes for the sale of any existing property you own
- record sale details with the government appointed Help to Buy Agency and CORE (COntinuous REcording of Social Housing lettings and sales) for government research and statistical purposes
- adapt our services to meet your needs



**Sometimes we'll need to share your data. Here's who we'll share it with and why:**

- credit check agencies; to assess your eligibility to rent a home or garage from us
- references from previous landlords to ensure you're a suitable applicant to rent a home from us
- we may share your details with the police if we believe that a crime is taking place
- third party estate agencies; to market and sell our properties. These agencies will not share your data with other companies and will only use your information to assist you with buying a home from us
- our panel mortgage advisors and your mortgage advisor/provider; to determine your eligibility and affordability to obtain a mortgage under our regulator guidance
- local authorities; we may need confirmation on who we can allocate a property to if there's a specific planning condition that must be met e.g. local applicants take priority
- our solicitors; to draft and complete details for all legal documents and processes in relation to your purchase. They will also use the details you provide to contact your solicitor to start the sale conveyancing process
- your solicitor for updates and to assist with your sale
- mortgage advisor/lender; for updates and to assist your mortgage progressing
- surveyors instructed by your mortgage lender to value the property you're buying
- Help to Buy Agent; we'll record details about you and your purchase on your Help to Buy application
- CORE (COntinuous REcording of Social Housing lettings and sales); we'll record details about you and your purchase within the CORE system. You'll receive more information in CORE's privacy notice

**Living in a VIVID Home:**

**When you're our customer, we collect the following data:**

- your email addresses and phone numbers
- the names and dates of birth of any other people living in your home
- payments made by you and details of any arrears
- any contact or correspondence that you've had with us
- any health issues and disabilities
- we may take photographs or film events that we host which you'll be invited to, you will be informed of this.

**We collect and process this information, so we can:**

- make sure that the details we have for you are accurate and up to date
- understand any vulnerabilities and needs you have, so we can adapt our services where necessary
- provide you with any advice and support you may need with claiming benefits, budgeting, improving your skills and being able to live independently in your home
- provide repairs and maintenance services in line with our landlord health and safety responsibilities



- collect photos, videos, news stories and case studies which allow us to promote our work; we do this with your consent
- ask you for feedback and carry out surveys to improve our services; this can be by a variety of contact methods such as email, telephone, text and/or face to face
- protect our staff and contractors by placing a “flag” over your tenancy if we consider you to be a risk to staff – we’ll let you know about this

**Sometimes we’ll need to share your data. Here’s who we’ll share it with and why:**

- external agencies who manage utilities in your home on our behalf
- the relevant local authorities to support their services to you
- we share contact details with external companies who carry out surveys for us, in the interest of our customers. Most commonly used are R&R and TLF Research
- contractors who carry out repairs and services on our behalf
- tenancy support services
- CORE; COntinuous REcording of Social Housing lettings and sales.

**Using our online services**

**When you use our online services, we collect the following data:**

- The date and time you used our services
- The pages you visited on our website and how long you visited them for
- IP address
- Internet browser and devices, you’re using
- Website address from which you accessed our website
- Details collected through forms filled in when you contact us online
- Surveys and polls about the website

**We collect this information, so we can:**

- Tailor our services to you
- Detect possible fraud
- Deal with rent arrears and unpaid bills
- Assist the police in solving crime and investigating anti-social behaviour
- Monitor performance and troubleshooting service issues

**We process all of the above with the following legal basis’:**

- Contract: the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract
- Legal obligation: the processing is necessary for us to comply with the law
- Legitimate interests: the processing is necessary for our legitimate interests, or the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests.
- Consent: you have given us clear consent to process your personal data for a specific purpose



- Vital Interest: the processing is necessary to protect someone's life.

**For equal opportunities monitoring, and only with your explicit consent, we may also collect information about the following:**

- Racial or ethnic origin
- Sex
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Data concerning health
- Sexual orientation

### **How long do we keep your data?**

We will try to regularly check your information to make sure it is still up to date. If you think we need to update any of the information we hold, please let us know.

We will keep your information for as long as it is relevant to the purposes set out above. We may therefore continue to hold information about you after you leave your home or no longer receive services from us, where this is still relevant. We may also be required to keep your information for legal reasons.

We will take steps to keep the information safe while we hold it and when we do not need it any more we will destroy it safely.

### **CCTV**

Some of our locations and offices have CCTV and you may be recorded when you visit them. We use CCTV to provide security and protect our staff and visitors.

CCTV is only viewed by staff when necessary, the footage is stored for a specific period, after which it is recorded over. We may share CCTV with the police to prevent and detect a crime. We may also share CCTV for evidence in an insurance claim or court case.

### **Call recordings**



Phone calls made to and from staff are recorded, these recordings are kept for 3 months. We use call recordings for internal training, to investigate complaints and we may also use them as evidence in a court case.

## **Website cookies**

Cookies are very small files that are placed on your computer by the websites you visit. They're common and used to make websites work more efficiently, provide a customised experience and send information back to the owners of the site. For more information on how we use website cookies, please visit [www.vividhomes.co.uk/cookies](http://www.vividhomes.co.uk/cookies).

## **How to contact us about your data:**

If you wish to express any of the above rights, please tell us and we'll respond as soon as we can.

You can contact our Information Governance Officer Lauren Cannon by emailing [customer@vividhomes.co.uk](mailto:customer@vividhomes.co.uk) or by calling 0800 652 0898

You may contact our Data Protection Officer David Holmes by emailing [dpo.vivid@dataprotectionpeople.com](mailto:dpo.vivid@dataprotectionpeople.com), by phone at 07519 110437 or by post:

The Round Factory Media Centre,  
Foundry Street,  
Leeds,  
LS11 5QP

You also have the right to contact the Information Commissioner's Office at <https://ico.org.uk> or call 0303 123 1113 for more information about your rights and how to make a formal complaint.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF